



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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Order Instituting Rulemaking to Consider the Adoption of a
General Order and Procedures to Implement the Digital
Infrastructure and Video Competition Act of 2006.

Rulemaking 06-10-005
(Filed October 25, 2006)

COMMENTS OF THE GREENLINING INSTITUTE ON PHASE II

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May 31, 2007

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I. INTRODUCTION

The Greenlining Institute (“Greenlining”) respectfully submits the following opening comments to the California Public Utilities Commission (“Commission” or “CPUC”) addressing the issues identified by the May 7, 2007 Scoping Memo reserved for Phase II of this proceeding for the implementation of the Digital Infrastructure and Video Competition Act of 2006 (“DIVCA”).

II. DISCUSSION

A. BUILD OUT REQUIREMENTS

Greenlining recommends that the Commission require identical build-out requirements for cable franchise holders with fewer than one million customers as those established by DIVCA for cable franchise holders with more than one million customers. Greenlining does not believe that cable franchise holders should be allowed to circumvent the important requirements for build out set in place by DIVCA. By allowing a “double standard” for franchise holders with less than one million customers, the Commission will be failing to uphold the necessary protections and mandates of DIVCA.

Moreover, Greenlining submits that DIVCA’s discharge of cable franchise holders from providing video service when the cost is substantially more than the average cost of providing video service in a

telephone service area provides adequate protections for cable franchise holders with fewer than one million customers.¹ The Commission's proposal that it allow "safe harbor" standards and "case-by-case" determinations will only create incentives for small cable franchise holders from meet the build out requirements. Greenlining does not believe that the Commission will be serving the needs of low-income and minority consumers in California, or the mandates of DIVCA and the legislature, if it allows any cable franchise holder opportunities to circumvent the build out requirements.

B. BROADBAND ACCESS AND ADOPTION INFORMATION

The goal of bridging the digital divide has not been met. New telecommunications technologies are still not fully accessible to California's minority, low-income and rural populations. Access to 21st century technologies is imperative to keep California's workforce competitive, to educate young adults adequately, and to ensure full civic participation of all Californians. These technologies include broadband service, as well as wired and digital video service.

In keeping with the stated objectives of DIVCA promote widespread and nondiscriminatory access, and continue access to the public, educational, and government (PEG) channels and the legislatures expressed intent to: (i) promote widespread access to technologically advanced cable and video services, and (ii) complement efforts to increase investment in broadband infrastructure, Greenlining urges the Commission to require cable franchise holders to annually report the following specific information.

1. How each franchisee has helped close the digital divide;
2. How each franchisee has funded access to new technologies by underserved communities;
3. How each franchisee has increased diversity at all levels of employment and management;
4. How each franchisee had created business opportunities for small businesses, small minority and women-owned businesses; and
5. How each franchisee has provided full content access to underserved and minority communities.

¹ See § 5890(c)

Greenlining submits that General Order (“GO”) 156 is a specific example of how effective reporting can be in meeting a stated objective. Diversity, as a Commission priority, has been translated into corporate priorities through the success of GO 156 and the Utility Supplier Diversity Program. Greenlining believes that this achievement can be mirrored by the cable industry, if they are held to a higher level of accountability for reporting. Greenlining further believes that reporting in such areas as diversity at all levels of employment and management, as well as diversity in the business opportunities for small businesses and small minority and women-owned businesses through contracting will DIVCA and the legislature’s goals.

Women and minorities are underrepresented in the ownership of media broadcast companies. Women and minorities account for 51 percent and 33 percent of the national population, yet they only own 4.97 and 3.26 percent of all broadcast stations, respectively.² New and incumbent cable service providers can help mitigate these disparities that exist by encouraging women and minority ownership of broadcast stations and networks. By contracting with women and minority owned networks and broadcast companies, the market for these businesses can be spurred and true diversity in the media can become a reality. Furthermore, Greenlining submits that the images and content in cable programming will become more diverse and reflective of the state’s population further ensuring that DIVCA and the legislature’s goals are met.

Coupled with diversity in employment and contracting, reporting mechanisms will allow new and incumbent cable service providers to highlight the efforts they have made to ensure that new technologies are both accessible and affordable to underserved communities and that the content of their cable and digital video service is diverse. Such reporting will be critical for the Commission’s goal of maintaining California a national leader in the area of diversity. Additionally, such reporting will aid the Commission

² See “Out of The Picture: Minority & Female TV Station Ownership in the United States” Current Status, Comparative Statistical Analysis & the Effects of FCC Policy and Media Consolidation, by S. Derek Turner and Mark Cooperon behalf of Free Press, a national, nonpartisan think tank.

in determining whether a “safe harbor” standard (if the Commission adopts such an allowance) should apply for a small cable provider that has failed to meet build out requirements.³ For example, if the small cable provider can show that it has engaged in substantial efforts to close the digital divide or increase access to new technologies by underserved communities, their failure to meet the build requirements can be assessed in a more favorable light. Absent such efforts by the small cable provider, Greenlining urges this Commission to hold the small cable provider to a high threshold and require a significant showing of hardship. Without such mechanisms, Greenlining fears that small cable providers will consistently fail to complete build out requirements.

Greenlining also urges the Commission to require all franchise holders to report on the specific broadband and video service technology that they are offering to customers providing deployment data by census tract. Greenlining believes that only through such detailed reporting can the Commission ensure that cable franchise holders are complying with DIVCA’s requirements regarding fiber optic deployment. Merely reporting that technology has been deployed and providing specific details as to the technology does not provide the necessary information to determine if franchise holders are providing access under DIVCA.

III. CONCLUSION

For all of the reasons stated above, Greenlining respectfully requests the Commission adopt the above recommendation for Phase II.

³ DIVCA requires that before the Commission makes any determinations as to discriminatory build out that public hearing be held. The above discussed information should likewise be provided publicly before any such hearings.

Dated: May 31, 2007

Respectfully submitted,

/s/ Robert Gnaizda

Robert Gnaizda

The Greenlining Institute

/s/ Thalia N.C. Gonzalez

Thalia N.C. Gonzalez

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CERTIFICATE OF SERVICE

I, Thalia N.C. Gonzalez, am 18 years of age or older and a non-party to the within proceeding. I am a resident and citizen of the State of California with the business address at the Greenlining Institute of 1918 University Avenue, Second Floor, Berkeley, CA 94704 and telephone number of 510-926-4002.

On May 31, 2007, I caused the following document:

COMMENTS OF THE GREENLINING INSTITUTE ON PHASE II

to be served upon all interested parties of record in R.06-10-005 named in the official service list via e-mail to those whose e-mail address is listed in the official service list and via first class mail with postage prepaid or facsimile to those whose e-mail address is not available.

I certify that the foregoing is true and correct.

Executed in Berkeley, California on May 31, 2007.

/s/ Thalia N.C. Gonzalez
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